

## Exhibit 32

Francesco Gallo

12/19/2007

1	Gallo	162	1	Gallo	164
2	dinner?		2	very helpful, helpful to the organization. And as a	
3	A. No, we were in the office.		3	matter of fact, on more than one occasion, I asked	
4	Q. Did they make a special visit to you to		4	the help of Mr. Marco D'Ilario, who did his best to	
5	tell you this about Mariotti?		5	retain Mr. Gabriele not to be fired.	
6	A. No special visit. I was there with them		6	Q. So the answer you have is that you spoke	
7	because Mariotti had to be fired.		7	with Marco D'Ilario, who was able to prevent the	
8	Q. Mariotti had to be fired in 2003 and 2004?		8	firing of --	
9	A. Yes.		9	A. He was aware, as well, because in some	
10	Q. Who said he had to be fired?		10	meetings every morning he was there.	
11	A. Mr. Galli.		11	Q. He was aware --	
12	Q. Did Mr. Galli say why?		12	A. That they were after Mr. Mariotti.	
13	A. Didn't trust him.		13	Q. Did you tell them that it would be illegal	
14	Q. Sorry?		14	to fire Mr. Mariotti because he is gay?	
15	A. Did not trust him.		15	A. Yes, many times.	
16	Q. He didn't trust him, okay. Did he say		16	Q. Well, just talk about this one time.	
17	anything else?		17	A. Okay.	
18	A. He told me that he had a brother		18	Q. What did they say in response to that?	
19	homosexual and in Zurich, Germany, France, I don't		19	A. That they couldn't take it anymore for me	
20	know where.		20	to be telling them all the time, this cannot be	
21	Q. Who had a homosexual brother?		21	done, that cannot be done, they were very, very	
22	A. Gabriele Mariotti.		22	upset to my position that I used to take.	
23	Q. Mariotti had a gay brother?		23	Q. Did you tell Marco D'Ilario that it would	
24	A. And that was because he's an actor or		24	be illegal to fire Mariotti because he is gay?	
25	whatever.		25	A. Yes, we spoke about many things.	
1	Gallo	163	1	Gallo	165
2	Q. Did Mr. Galli say that he didn't trust		2	Q. And did Mr. Marco D'Ilario get upset?	
3	Mariotti because of Mariotti's brother?		3	A. No. As I said, Mr. Marco D'Ilario	
4	A. No.		4	intervened and helped the situation with Mr. Libutti	
5	Q. Did he say why he didn't trust Mariotti?		5	not to be fired.	
6	A. No.		6	Q. Mr. Libutti? I thought it was Mr. Galli.	
7	Q. Was Mariotti fired?		7	A. Both of them. Both of them.	
8	A. Was not, as far as I know, because I left		8	Q. Mr. Libutti said he didn't trust	
9	Mariotti at Alitalia when I was fired, but I believe		9	Mr. Mariotti either?	
10	that he resigned.		10	A. Yes, yes.	
11	Q. He resigned in 2006?		11	Q. You're sure?	
12	A. Right.		12	A. Positive, yes.	
13	Q. Okay. Why wasn't Mariotti fired in 2003		13	Q. And did Mr. Libutti say he wanted to fire	
14	or '04 when Galli told you that he didn't trust him		14	Mr. Mariotti because he is gay?	
15	and that he had to be fired?		15	A. Yes.	
16	A. Mr. Mariotti was not the only one that was		16	Q. He said that too?	
17	in the list of people to be fired.		17	A. Yes, not only, but there has been a time	
18	Q. Let's talk about Mariotti.		18	an anonymous letter was received -- well, forget it.	
19	A. Okay.		19	You ask me the question.	
20	Q. I asked about Mariotti.		20	Q. I'm asking a question about what Libutti	
21	A. Okay.		21	and Galli said in your meeting; Libutti said he	
22	Q. And some of the information you give is		22	wanted to fire Mariotti because he's gay?	
23	very helpful, but answer the question first.		23	A. Not just Mariotti, everyone.	
24	A. Okay. I did my best to make both of them		24	Q. He wanted to fire all the gay people?	
25	understand that Mariotti was a capable person and		25	A. Right, or lesbian.	

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1	Gallo	166	1	Gallo	168
2	Q. Did he give you a list?		2	or she may have hairy legs; what did he say?	
3	A. He had a list.		3	A. Didn't like.	
4	Q. How do you know?		4	Q. He said he didn't like her?	
5	A. He was right in front of me, on a yellow		5	A. Right.	
6	pad.		6	Q. Why wasn't she fired, if you know?	
7	Q. It was a list of gay people and lesbians?		7	A. Because I raised hell.	
8	A. Yeah, people that had to be let go.		8	Q. You raised hell on behalf of Angela?	
9	Q. Because they were gay and lesbian?		9	A. Sure, not the only one.	
10	A. Because they were gay, lesbian, old,		10	Q. You raised hell on behalf of everybody on	
11	physical defect, you name it.		11	the list?	
12	Q. Well, you name it. Is that what he told		12	A. Almost, almost, some, yeah.	
13	you, I have a list here of people who are gay, old,		13	Q. Was anybody fired from that list that you	
14	have physical defects, you name it, and they're on		14	know of?	
15	my list; is that what he said?		15	A. There were seven, at least.	
16	A. That's what he wanted it. That's what he		16	Q. On that list, the list that Libutti	
17	told me was his plan.		17	supposedly showed you at this meeting in 2003 or	
18	Q. What did he say? Did he say we're going		18	2004 where you learned for the first time that	
19	to fire all the gay, old and physical-defect people?		19	Libutti thought and Gallo thought that Mariotti was	
20	A. Yes, talking about some people.		20	gay, that meeting.	
21	Q. Some people or all?		21	A. Counsel, he was writing names, then he	
22	A. Some people with physical defect.		22	make a ball, discuss and throw out. So there are	
23	Q. What people with physical defects did		23	many, many things, depends on his mind, on a daily	
24	Mr. Libutti want to fire at this conversation in		24	mind, what was go through.	
25	2003 or 2004?		25	Q. Who got fired because they were gay, to	
1	Gallo	167	1	Gallo	169
2	A. One was Angela Ross.		2	your knowledge?	
3	Q. Mr. Libutti wanted to fire Angela Ross?		3	A. I don't remember.	
4	A. Oh, yes.		4	MR. SMITH: Just gay or perceived gay?	
5	Q. All right. Did you get Mr. D'Ilario to		5	A. Gay, perceived gay, whatever.	
6	protect Angela Ross, as well?		6	Q. I'll get to perceived gay. All right. Do	
7	A. No.		7	you know of anybody who was fired because he was	
8	Q. Was she fired?		8	perceived to be gay?	
9	A. As long -- I don't think so, as long as I		9	A. Some people in Reservation Office.	
10	was there, she was not fired.		10	Q. Do you know the names of any of them?	
11	Q. What was her physical defect?		11	A. I don't remember.	
12	A. Well, he was criticizing because she was		12	Q. Did you approve those firings?	
13	wearing all the time pants. And he was saying, God		13	A. Maybe some of them, yes, maybe some of	
14	knows what kind of hair she must have on her legs.		14	them, yeah.	
15	Well, she's sick and she was sick and she is sick, I		15	Q. Do you remember the names of anybody you	
16	don't know.		16	approved to be fired because that person was gay or	
17	Q. Was she sick then?		17	perceived to be gay?	
18	A. She had cancer.		18	A. Yeah, I'm sure of one, but I don't	
19	Q. Do you know that?		19	remember the name, it is more than --	
20	A. I was at the hospital with her. What do		20	Q. Do you remember anybody who was fired	
21	you mean, do I know that?		21	because she was lesbian or perceived to be lesbian?	
22	Q. I'm asking then. Was she sick then?		22	A. I think so.	
23	A. Yes.		23	Q. Can you give me any names?	
24	Q. All right. And did he say I'll fire her		24	A. Probably some participated because the	
25	because she has cancer or because she has hairy legs		25	aim, the strategy, at least my strategy, was to try	

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<p>1 Gallo 170  2 to solve these problems with early retirement or  3 special packages.  4 When I left Alitalia, I had at least two  5 persons that I had to find a solution to fire  6 because the lesbian, and old, I don't know if then  7 she was fired or not, I don't know.  8 Q. What's the name of the employee you're  9 thinking of?  10 A. That's what I am wondering.  11 Q. You said you had a list, you said you had  12 a list at the time you left Alitalia, a list of  13 people that you had to find solutions for.  14 A. No, no, no, it was a list of people, you  15 know, that he gave me a series of names.  16 Q. Libutti gave you a list of names; is that  17 what you're saying?  18 A. Libutti gave me a list of names that had  19 to be terminated.  20 Q. When was that?  21 A. It was more than one occasion.  22 Q. We will go to every one of those  23 occasions. You told me so far that Libutti kept  24 writing names down on a list and then rolling them  25 up in a ball and throwing them away.</p>	<p>1 Gallo 172  2 but again, this list, these lists, are prepared, and  3 even Angela knows are done for.  4 Q. When did you give Angela Ross lists?  5 A. Many times.  6 Q. Okay, many times. When is the last time  7 you gave her a list of people to be fired?  8 A. It was in conjunction to the last  9 early-retirement plan that I proposed.  10 Q. This was a list of people who were  11 eligible for early retirement?  12 A. Some of them. As a matter of fact, in  13 order to have some people to reenter in the package,  14 we moved the age of the employees from 55 to 50, 53,  15 I don't remember.  16 Q. Tell me when again, what was this list you  17 gave to Angela, you said it was in conjunction with  18 the last early-retirement plan?  19 A. Yes.  20 Q. Wasn't that in 2005?  21 A. Yeah, but it took, whenever, 2005, we had  22 three early retirement.  23 Q. We will talk about the early-retirement  24 plans later. I'm talking about lists right now.  25 What did this list that you gave to Angela</p>
<p>1 Gallo 171  2 Did he ever give you a list in that  3 meeting in 2003 or 2004?  4 A. No, but I wrote the list in my mind.  5 Q. Did he ever give you a list at some  6 subsequent time?  7 A. Oh, yes, many times.  8 Q. Yes, many times?  9 A. Yes.  10 Q. Where are those lists?  11 A. Destroyed or passed over to, asked Angela  12 or Linda in Personnel Department to create a list,  13 but in order that they could not understand what  14 actually wanted to read, utilizing an excuse how to  15 prepare such a list.  16 Q. Do you have any of those lists today?  17 A. No, I don't have, as of today, I think  18 that I gave to you everything that I had.  19 Q. Yes, we will get to that. I'm just asking  20 if you have any of those lists.  21 A. As of today, no.  22 Q. All right. Were any of those lists in the  23 boxes that you packed when you left Alitalia?  24 A. No, because those lists are being kept in  25 Personnel, personally given by me to Angela Ross,</p>	<p>1 Gallo 173  2 Ross consist of; what names were on the list?  3 A. Actually, I requested Angela to prepare a  4 list and see if the people that Mr. Libutti and  5 Alitalia don't want anymore could be in the list of  6 those people. After analyzed, I give back the list  7 to Angela.  8 Q. This was a list of people who would be  9 eligible for early retirement, correct?  10 A. Yeah, but I did not know demographic. I  11 did not know if passing a preretirement package,  12 those people that desired to fire would have been  13 eligible or not, so I was forced to ask.  14 Q. Did you make any notations on the list  15 Angela gave you?  16 A. On some of them, maybe.  17 Q. Maybe, you just don't remember?  18 A. Maybe that I don't remember, right, but  19 some probably.  20 Q. I don't remember is all you have to say.  21 A. Right.  22 Q. You don't remember whether you made  23 notations on the list. Did you discuss the list  24 with Angela in any way?  25 A. Some of them.</p>

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12/19/2007

<p>1 Gallo 174</p> <p>2 Q. Some of them you discussed with Angela?</p> <p>3 A. Some of them, right.</p> <p>4 Q. Did you tell Angela that there were people</p> <p>5 on that list who Libutti wanted to fire?</p> <p>6 A. No, I would never say that to Angela.</p> <p>7 Q. Did you say that to anybody?</p> <p>8 A. Absolutely not.</p> <p>9 Q. All right. How did you know which people</p> <p>10 Libutti wanted to fire?</p> <p>11 A. How did I know it? Because he asked me.</p> <p>12 Q. Did he give you a list?</p> <p>13 A. No.</p> <p>14 Q. What people did he ask you to fire?</p> <p>15 A. Many.</p> <p>16 Q. Do you know the names of any?</p> <p>17 A. LoRusso, Mariotti, Angela Ross, Linda</p> <p>18 Monsariti, I don't remember her last name.</p> <p>19 Q. Was Ms. LoRusso eligible for early</p> <p>20 retirement?</p> <p>21 A. She was not.</p> <p>22 Q. Was Angela Ross eligible for early</p> <p>23 retirement?</p> <p>24 A. Yes.</p> <p>25 Q. Did she take it?</p>	<p>1 Gallo 176</p> <p>2 A. What elderly? I don't know to be elderly.</p> <p>3 Q. What do you mean? What is old? What is the age?</p> <p>4 A. I don't know what you mean. You're the</p> <p>5 one who used the word "older" all over your</p> <p>6 complaint. You said he said I want to fire older</p> <p>7 people and that was --</p> <p>8 A. After 50, you know, already, maybe even 45</p> <p>9 at Alitalia.</p> <p>10 Q. Seriously? Was she over 50?</p> <p>11 A. I believe so, yes.</p> <p>12 Q. Was he seriously calling her a whore?</p> <p>13 A. MR. SMITH: All right.</p> <p>14 Q. I'm not saying it's impossible to be whore</p> <p>15 over 50. I want to know, was that a serious</p> <p>16 accusation against her?</p> <p>17 A. MR. SMITH: Wait, wait. Objection.</p> <p>18 A. MR. KORAL: Why? Okay, well, he can</p> <p>19 answer. It's certainly not privileged.</p> <p>20 A. MR. SMITH: Are you asking him to</p> <p>21 speculate as to why?</p> <p>22 A. MR. KORAL: He may know whether it was</p> <p>23 serious or whether Mr. Libutti was joking. And</p> <p>24 I don't want to explain my questions too much</p> <p>25 because it would be tipping off the witness too</p>
<p>1 Gallo 175</p> <p>2 A. No, she did not.</p> <p>3 Q. Was she fired anyway?</p> <p>4 A. I prepared a document for her.</p> <p>5 Q. You prepared a document to fire her?</p> <p>6 A. No.</p> <p>7 Q. My question was, was she fired anyway.</p> <p>8 A. I don't know what happened as of today,</p> <p>9 but as long as I've been in Alitalia, she was not</p> <p>10 fired.</p> <p>11 Q. Do you know of anybody who was fired who</p> <p>12 Mr. Libutti asked you to fire?</p> <p>13 A. I can't recall. Mariani.</p> <p>14 Q. Libutti asked you to fire Mariani?</p> <p>15 A. Yeah.</p> <p>16 Q. Did he tell you why he was asking you to</p> <p>17 fire Mariani?</p> <p>18 A. Because she's a miniatia.</p> <p>19 Q. And what does miniatia mean in English?</p> <p>20 A. Whore.</p> <p>21 Q. Okay. Was she a lesbian whore?</p> <p>22 A. I don't know. I don't think so.</p> <p>23 Q. Okay. Was she an elderly whore?</p> <p>24 A. Excuse me?</p> <p>25 Q. Was she elderly?</p>	<p>1 Gallo 177</p> <p>2 much.</p> <p>3 A. MR. SMITH: You can ask him if you ask him</p> <p>4 the question differently, and I won't say how.</p> <p>5 A. MR. KORAL: You can make an objection and</p> <p>6 if it's a bad question, the judge will</p> <p>7 ultimately not allow the answer. That's what</p> <p>8 objections are for.</p> <p>9 Q. But I will rephrase it and say, do you</p> <p>10 think Mr. Libutti was serious when he called Anna a</p> <p>11 whore?</p> <p>12 A. I think so, yes.</p> <p>13 Q. All right. Who else got fired besides</p> <p>14 Anna Mariani?</p> <p>15 A. There were other people. I don't remember</p> <p>16 the name, but I can report to you the job position</p> <p>17 if that helps, the job that they were doing.</p> <p>18 Q. All right, tell me what job.</p> <p>19 A. Was the secretary of Mr. Marchese.</p> <p>20 Q. Marchese's secretary?</p> <p>21 A. Right.</p> <p>22 Q. She got fired?</p> <p>23 A. Yes.</p> <p>24 Q. She got fired because she was a lesbian?</p> <p>25 A. I didn't say that.</p>

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Francesco Gallo

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1	Gallo	178	1	Gallo	180
2	Q. I'm asking.		2	made sure that I knew it.	
3	A. No.		3	Q. Mr. DiDomenico made sure that you knew it?	
4	Q. Did she get fired because she had a		4	A. Yes.	
5	physical disability?		5	Q. Okay. How did he do it?	
6	A. I believe that she was fired because --		6	A. Talking to Mr. Fanti, talking to	
7	Q. Answer my question.		7	Mr. Mazzucco, talking to Gabriele Mariotti, talking	
8	A. Yeah.		8	to people that --	
9	Q. Did she get fired because she had a		9	Q. So nothing really more than you have	
10	physical disability?		10	already told me?	
11	A. I don't know.		11	A. Yeah.	
12	Q. All right. And then you started to say		12	Q. Okay.	
13	you believe she was fired for what reason?		13	MR. SMITH: Okay, let's take a break.	
14	A. If I recall, primarily because she refused		14	MR. KORAL: Okay. I thought maybe we	
15	to do personal request, personal work for Libutti,		15	could finish with Mr. DiDomenico. It's just	
16	Marchese or whoever else was there.		16	one more question, because I think it's going	
17	Q. Okay. All right. At this rate, we're		17	to be a short answer.	
18	going to be at it for a month, but your initial Rule		18	MR. SMITH: Franco, are you okay?	
19	26 disclosures state that Mr. DiDomenico has		19	THE WITNESS: One more question, yeah,	
20	information about the unlawful discriminatory and		20	sure.	
21	retaliatory motivating factors of Defendants.		21	Q. It also says, "as well as Plaintiff's	
22	What information does Mr. DiDomenico have		22	defamation claim."	
23	about the defendants' motivations that were		23	What does Mr. DiDomenico know about your	
24	discriminatory or retaliatory?		24	defamation claim, anything that you haven't told me	
25	A. That Alitalia was firing me as a		25	already?	
1	Gallo	179	1	Gallo	181
2	retaliation of the allegation that I tried to stop		2	A. That Mr. Libutti was making defamation	
3	such practices.		3	comments about me all over.	
4	Q. What does Mr. DiDomenico know about it?		4	Q. What comments was he making that were	
5	A. There were many telephone conversations		5	defamatory? And if it's a long answer, we can	
6	that he had with Mr. Giulio Libutti. They were very		6	break.	
7	good friends.		7	A. No. That I was gay, and that I was not to	
8	Q. Did Mr. DiDomenico ever tell you that		8	work for Alitalia here, so Libutti, Galli, had to	
9	Mr. Giulio Libutti's motive for firing you, assuming		9	pursue the elimination of Gallo from North America.	
10	Mr. Libutti had anything to do with it --		10	Q. That's the defamatory statements that	
11	A. He didn't tell me.		11	you're talking about?	
12	Q. Let me finish. He didn't tell you that?		12	A. Yeah.	
13	A. Directly, no.		13	MR. KORAL: Let's take our break.	
14	MR. SMITH: Counsel, please ask your		14	THE VIDEOGRAPHER: The time is 3:37 p.m.	
15	question, that's fine, but after this I		15	We're going off the record.	
16	recommend we take a five-minute break to		16	(A brief recess was taken.)	
17	refresh.		17	THE VIDEOGRAPHER: The time is 3:50 p.m.	
18	MR. KORAL: Fine. The room is a little		18	We're back on the record.	
19	warm.		19	MR. KORAL: All right. I believe that	
20	Q. So Mr. DiDomenico never told you that		20	Derek Smith has a statement he needs to make.	
21	Mr. Libutti said anything about firing you in		21	MR. SMITH: Yes. I'm just going to say	
22	retaliation or for discrimination?		22	that with deference to my client's health	
23	A. To me personally?		23	condition and the fact that we have been on the	
24	Q. Mr. DiDomenico.		24	record starting a little after 10:00 today, I	
25	A. He did not have the courage to, but he		25	don't know exactly how many hours of testimony,	

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